# KANE SCRAP IRON & METAL INC.

P.O. Box 923 • 184 E. Meadow Street • Chicopee, MA 01014
Tel. 413-594-5160 • Fax. 413-594-1939
Buyers of Ferrous and Nonferrous Metals

October 7, 2015

Nora J. Chorover Law Office of Nora J. Chorover 11 Green Street Boston, MA 02130

Re: 60-Day Notice of Violations and Intent to File Suit Regarding Noncompliance with

Federal Clean Water Act's Industrial Stormwater Discharge Requirements:

184 East Meadow Street, Chicopee, MA

Dear Attorney Chorover:

This letter is in response to Clean Water Action's correspondence dated August 21, 2015 to Robert E. Kane, Jr., President, of Kane Scrap Iron & Metal, Inc. ("Kane") regarding stormwater discharges from the Kane facility located at 184 East Meadow Street in Chicopee, Massachusetts. From the outset, Kane wants to emphasize that it is taking CWA's allegations very seriously. Kane believes, however, that any concerns raised by CWA will be addressed to CWA's satisfaction in this response. For purposes of simplicity, we have addressed our responses according to the headings and numbered paragraphs set forth in your letter.

### KANE'S VIOLATIONS AND DATES OF VIOLATIONS

# 1. Failure to Comply with the Permit's Monitoring Requirements

CWA alleges that Kane failed to monitor its discharges in accordance with the specific provisions of Section 6 of the MSGP during certain quarters. By way of background, Kane submitted its Notice of Intent (NOI) under the US EPA NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) on September 13, 2011. Stormwater monitoring under the MSGP, therefore, did not begin until the following quarter (Oct-Dec 2011). CWA's claim alleges that stormwater monitoring was not performed during the Oct-Dec 2011 and Oct-Dec 2014 quarters. Kane disagrees with CWA's claim that monitoring of stormwater was not performed during these time periods. Monitoring of stormwater from Outfalls DA-001 and DA-002 at the Kane facility were, in fact, monitored on December 22, 2011 and December 16, 2014, respectively. Please refer to Attachment A which contains the December 22, 2011 and December 16, 2014 Laboratory Analytical Reports.

CWA also alleges that Kane failed to utilize an appropriate hardness value when monitoring for copper, lead and zinc. Our consultant, Environmental Compliance Services, Inc. (ECS), recently sampled the receiving waterbody for hardness. Validated sample results yielded a value of 44.7 milligrams per liter. Please refer to Attachment B which contains the September 10, 2015 Laboratory Analytical Report. The corresponding benchmark values for copper, lead and zinc have been selected and applied retroactively and going forward.

# 2. Failure to Comply with the Permit's Reporting Requirements

CWA alleges that Kane failed to submit quarterly benchmark monitoring reports to EPA during certain quarters. As stated previously, Kane submitted its NOI under the MSGP on September 13, 2011. Reporting under the MSGP did not begin until the following quarter (Oct-Dec 2011). It is our understanding that reports for the remaining periods in question were previously submitted to the EPA in January 2012 and January 2014, respectively. In response to your August 21, 2015 correspondence, we made an inquiry to the EPA regarding these reports. We were informed by EPA that they could not locate the reports, despite our contention that they were, in fact, filed. To ensure that EPA's records were current, we filed the reports again on October 1, 2015. Additionally, we also submitted all previous stormwater monitoring results to MassDEP on September 25, 2015. Please refer to Attachment C for cover letters (without attachments) and UPS receipts of these submittals to EPA and MassDEP.

CWA has also alleged that Kane failed to prepare and submit to EPA annual reports that include findings from its annual comprehensive site inspections and documentation of corrective actions. As stated previously, Kane submitted its NOI under the MSGP on September 13, 2011. As such, an Annual Report for 2010 was not submitted. Kane's NOI was submitted less than three months before the end of the September 29, 2010 - September 29, 2011 inspection period. Per Section 4.3.1 of the MSGP, no comprehensive site inspection was required to be performed. Accordingly, no Annual Report was required to be submitted for 2011.

The Annual Reports for 2012, 2013 and 2014 were submitted on September 27, 2012, October 9, 2013, and October 1, 2014, respectively. As you can see from these annual reports, Kane has prepared and submitted to EPA annual reports that include findings from its annual comprehensive site inspections and documentation of corrective actions. Kane has and continues to identify and implement control measures and corrective actions aimed at minimizing the pollutants in its stormwater discharge. These control measures and corrective actions are documented in Section D of the 2012, 2013 and 2014 Annual Reports which are provided in Attachment D of this letter.

# 3. Failure to Minimize Pollutants and Implement Corrective Actions

CWA alleges that Kane, by failing to monitor its stormwater discharges, could not have ensured that proper control measures are minimizing its pollutant discharges. As we have outlined above, Kane has, in fact, been monitoring its stormwater discharges. Accordingly, Kane disputes any contention by CWA that it has not implemented proper control measures to minimize its pollutant discharges.

To the contrary, Kane, as part of its Stormwater Pollution Prevention Plan, has adopted many of the best management practices set forth in Section 2.1.2 (Non-Numeric Technology-Based Effluent Limits) and Section 8.N.3 (Technology-Based Effluent Limits) of the MSGP. These best management practices include, but are not necessarily limited to, the following:

- Inbound scrap material control program via a List of Prohibited Scrap Materials that is provided to all customers;
- When/where feasible, materials and equipment are staged indoors or under cover and on concrete pads or surrounded by concrete barriers;
- Waste containers are covered unless being loaded or unloaded;
- All waste is handled/disposed in accordance with Federal and State regulations;
- All spent batteries are stored indoors and are properly recycled/disposed;
- No vehicle washing is conducted on site;
- Fork truck maintenance is conducted indoors;
- All containers of oil or hazardous substances are stored inside buildings and either equipped with secondary containment or stored in areas where the floor is in good condition and not equipped with floor drains and no building exits are located nearby;
- Spill/overflow protection equipment is used, as are fueling hoses with check valves:
- Spill response equipment is maintained on site and spills are immediately cleaned up;
- Equipment and material storage areas are inspected quarterly; and
- Employees are trained in these practices annually.

Moreover, Kane has and continues to identify and implement control measures and corrective actions aimed at minimizing the pollutants in its stormwater discharges. These are documented in Section D of the 2012, 2013 and 2014 Annual Reports which are provided as part of Attachment D to this letter. A synopsis of structural control measures employed to date, in addition to those listed above, is as follows:

#### 2011:

• Sediment blockers installed in DA-001 and DA-002

#### 2012:

 Bi-weekly manual sweeping within a thirty foot radius around DA-001 and DA-002

- Weekly sweeping of paved areas with a street sweeper
- Installation of asphalt curbing along non-paved areas

2013:

- Weekly sweeping of paved areas with a street sweeper
- Installation of silt fence/straw bale barriers around unpaved and production/storage areas

2014:

- Weekly sweeping of paved areas with a street sweeper
- Evaluation of catch basin filtration inserts for DA-001 and DA-002

2015:

- Weekly sweeping of paved areas with a street sweeper
- Purchase of CleanWay Storm Clean catch basin filtration inserts for DA-001 and DA-002 with installation following receipt of these custom-made devices (estimated year end 2015)

While Kane has not been able to achieve the applicable EPA benchmark levels for four consecutive quarters, the stormwater monitoring results have nonetheless been steadily decreasing. Please see the line graphs in Attachment E. As shown in the line graphs, there has been a downward trend in aluminum, copper, iron, zinc and chemical oxygen demand at both outfalls.

Additional technology and infrastructure investment using the CleanWay catch basin inserts is anticipated to result in further reductions in our regulated discharge parameters. These inserts have been ordered and paid for and are expected to be installed by the end of calendar year 2015. Please refer to the following links for further detailed information on this equipment:

http://www.cleanwayusa.com/catch-basin-filtration-inserts.php http://www.cleanwayusa.com/metals-removal-media.php.

#### CONCLUSION

Kane respectfully disagrees with CWA that its Notice of Violations and Intent to File Suit sufficiently states the basis for a civil action. As conclusively demonstrated herein, Kane has complied with its monitoring, reporting and implementation of corrective action requirements associated with the MSGP. Kane has demonstrated a commitment to compliance under the MSGP. Kane has established a continuous improvement system which has been and continues to be successful in reducing regulated discharge parameters. Given that Kane has been maintaining compliance with the MSGP, any alleged violations have been remedied and it is unlikely that any past alleged violations will recur, we believe litigation is not appropriate.

Kane trusts that this response meets the concerns of Clean Water Action regarding the alleged MSGP violations and demonstrates the company's record of compliance. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Robert Kane President

Attachments

cc: (by certified mail)

Curt Spalding, Regional Administrator EPA New England, Region 1 5 Post Office Square, Ste. 100 Boston, MA 02109

Gina McCarthy, Administrator US EPA Headquarters Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Eric Holder, Attorney General US Department of Justice 950 Pennsylvania Avenue, N.W. Washington, DC 20530-0001

Martin Suuberg, Commissioner Massachusetts Department of Environmental Protection One Winter Street Boston, MA 02108

# ATTACHMENT A

December 22, 2011 and December 16, 2014 Laboratory Analytical Reports

Report Date: 06-Jan-12 11:25



Final Report

Re-Issued Report

Revised Report

Featuring
HANIBAL TECHNOLOGY

Laboratory Report

Environmental Compliance Services 588 Silver Street Agawam, MA 01001

Agawam, MA 0100 Attn: Todd Donze Project: Kane Scrap Iron + Metal Inc - Chicopee, MA

Project #: 01-215-977.00.00

Laboratory ID	Client Sample ID	<u>Matrix</u>	Date Sampled	Date Received
SB41540-01	DA-001	Storm Water	22-Dec-11 00:00	22-Dec-11 15:10
SB41540-02	DA-002	Storm Water	22-Dec-11 00:00	22-Dec-11 15:10

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received.

All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110 Connecticut # PH-0777 Florida # E87600/E87936 Maine # MA138 New Hampshire # 2538 New Jersey # MA011/MA012 New York # 11393/11840 Pennsylvania # 68-04426/68-02924 Rhode Island # 98 USDA # S-51435



Authorized by:

Nicole Leja Laboratory Director

Ticolo Leja

Spectrum Analytical holds certification in the State of Massachusetts for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of Massachusetts does not offer certification for all analytes. Please note that this report contains 7 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Spectrum Analytical, Inc.

Spectrum Analytical, Inc. is a NELAC accredited laboratory organization and meets NELAC testing standards. Use of the NELAC logo however does not insure that Spectrum is currently accredited for the specific method or analyte indicated. Please refer to our "Quality" web page at www.spectrum-analytical.com for a full listing of our current certifications and fields of accreditation. States in which Spectrum Analytical, Inc. holds NELAC certification are New York, New Hampshire, New Jersey and Florida. All analytical work for Volatile Organic and Air analysis are transferred to and conducted at our 830 Silver Street location (NY-11840, FL-E87936 and NJ-MA012).

#### **CASE NARRATIVE:**

The samples were received 0.4 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of +/- 2.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

See below for any non-conformances and issues relating to quality control samples and/or sample analysis/matrix.

### **EPA 200.7**

#### Blanks:

#### 1127058-BLK1

The method blank contains analyte at a concentration above the MRL; however, concentration is less than 10% of the sample result, which is negligible according to method criteria.

Iron

Client Project # 01-215-977.00.00

<u>Matrix</u> Storm Water Collection Date/Time
22-Dec-11 00:00

Received 22-Dec-11

3D#1540-	-01											
CAS No.	Analyte(s)	Result	Flag Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Met	als by EPA 200/6000 Series	Methods										
	Preservation	Field Preserved	N/A			1	EPA 200/6000 methods	23-Dec-11	23-Dec-11	AMT	1126933	
Total Met	als by EPA 200 Series Meti	rods										
7429-90-5	Aluminum	4.99	mg/l	0.0250	Q.01 <b>67</b>	1	EPA 200.7	28-Dec-11	30-Dec-11	ir	1127058	X
7440-50-8	Copper	0.395	mg/l	0.0050	0.0024	1	•	#	03-Jan-12	•	•	X
7439-89-6	Iron	9.62	mg/l	0.0150	0.0098	1		-	30-Dec-11		•	Х
7439-92-1	Lead	0.345	mg/l	0.0075	0.0028	1		•	*		•	×
7440-66-6	Zinc	0.414	mg/l	0.0050	0.0025	1	*	•	*	•	•	x
General C	Chemistry Parameters											
	Hardness	286	mg/l CaCO3	0.291	0.242	1	SM 2340B	28-Dec-11	30-Dec-11	Ir	1127058	×
	Chemical Oxygen Demand	218	mg/l	20.0	6.50	1	HACH8000	29-Dec-11	29-Dec-11	GMA	1127277	×
	Total Suspended Solids	3,710	mg/l	50	31	1	SM2540D	28-Dec-11	29-Dec-11	BD	1127152	X

Sample Io DA-002 SB41540	dentification -02			Client Project # 01-215-977.00.00		<u>Matrix</u> Storm Wa		Collection Date/Time 22-Dec-11 00:00			Received 22-Dec-11	
CAS No.	Analyte(s)	Result	Flag Units	*RDL	MDL	Dilution	Method Ref.	Prepared	An <b>al</b> yzed	Analyst	Batch	Cers.
Total Met	als by EPA 200/6000 Series	Methods										
	Preservation	Field Preserved	N/A			1	EPA 200/6000 methods	23-Dec-11	23-Dec-11	AMT	1126933	
Total Met	als by EPA 200 Series Meti	hods										
7429-90-5	Aluminum	15.6	mg/l	0.0250	0.0167	1	EPA 200.7	28-Dec-11	30-Dec-11	ir	1127058	X
7440-50-8	Copper	0.553	mg/l	0.0050	0.0024	1	*	•	03-Jan-12	•	•	X
7439-89-6	Iron	25.4	mg/l	0.0150	0.0098	1	ь	•	30-Dec-11	•		х
743 <del>9</del> -92-1	Lead	0.385	mg/l	0.0075	0.0028	1	•	•		*	•	X
7440-66-6	Zinc	0.792	mg/f	0.0050	0.0025	1	•	•	*	**	•	X
General C	hemistry Parameters											
	Hardness	136	mg/l CaCO3	0.291	0.242	1	SM 2340B	28-Dec-11	30-Dec-11	lr.	1127058	x
	Chemical Oxygen Demand	171	m <b>g/l</b>	20.0	6.50	1	HACH8000	29-Dec-11	29-Dec-11	GMA	1127277	×
	Total Suspended Solids	740	mg/i	50	31	1	SM2540D	28-Dec-11	29-Dec-11	BD	1127152	X

# Total Metals by EPA 200 Series Methods - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Butch 1127058 - EPA 200 Series					, <del>, , , , , , , , , , , , , , , , , , </del>					
Blank (1127058-BLK1)					Pr	epared: 28-	Dec-11 An	alyzed: 30-D	ec-11	
Zinc	< 0.0050		mg/l	0.0050						
Lead	< 0.0075		mg/l	0.0075						
Iron	0.0646	QB1	rig/l	0.0150						
Aluminum	< 0.0250		mg/l	0.0250						
Copper	< 0.0050		mg/l	0.0050						
LCS (1127058-B81)					Po	epared: 28-	Dec-11 An	alyzed: 30-D	ec-11	
Lead	1.37		mg/l	0.0075	1.25		109	85-115		
Iron	1.40		rng/l	0.0150	1.25		112	85-115		
Zinç	1.32		mg/l	0.0050	1.25		106	85-115		
Aluminum	1.39		mg/l	0.0250	1.25		111	85-115		
Copper	1,37		mg/l	0.0050	1.25		110	85-115		

# General Chemistry Parameters - Quality Control

Analyte(s)	Result	Flag Units	*RDL		Source Result %RE	%REC C Limits	RPD	RPD Limit
Batch 1127058 - EPA 200 Series							<del> </del>	
Blank (1127058-BLK1)				Propa	red: 28-Dec-11	Analyzed: 30-	Dec-11	
Hardness	< 0.291	mg/l CaCO3	0.291					
LCS (1127056-BS1)				Prepa	red: 28-Dec-11	Analyzed: 30-	Dec-11	
Hardness	23.0	mg/I CaCO3	0.291	20.8	111	85-115		
Batch 1127152 - General Preparation								
Blank (1127152-BLK1)				Prepar	red: 28-Dec-11	Analyzed: 29-	Dec-11	
Total Suspended Solids	< 5	mg/l	5					
LCS (1127152-BS1)				Prepar	red: 28-Dec-11	Analyzed: 29-	Dec-11	
Total Suspended Solids	86	mg/l	10	89.0	97	90-110		
Batch 1127277 - General Preparation								
Blank (1127277-BLK1)				Prepar	red & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	< 5.00	mg/l	5.00					
LC\$ (1127277-B\$1)				Prepar	red & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	49.3	mg∄	5.00	50.0	99	90-110		
Calibration Blank (1127277-CCB1)				Prepar	red & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	0.125	mg/l						
Calibration Blank (1127277-CCB2)				Prepar	red & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	1.14	mg∕l						
Calibration Blank (1127277-CCB3)				Prepar	ed & Analyzed;	29-Dec-11		
Chemical Oxygen Demand	0.276	mg/l						
Calibration Check (1127277-CCV1)				Prepar	ed & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	49.1	mg/l		50.0	98	90-110		
Calibration Check (1127277-CCV2)				Prepar	ed & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	48.0	mg/f		50.0	96	90-110		
Calibration Check (1127277-CCV3)				Prepar	ed & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	48.7	mg/l		50.0	97	90-110		
Reference (1127277-SRM1)				Prepar	ed & Analyzed:	29-Dec-11		
Chemical Oxygen Demand	74.5	mg/l	5.00	77.5	96	79-115		

#### Notes and Definitions

QB1 The method blank contains analyte at a concentration above the MRL; however, concentration is less than 10% of the sample result, which is negligible according to method criteria.

dry Sample results reported on a dry weight basis

NR Not Reported

RPD Relative Percent Difference

<u>Laboratory Control Sample (LCS)</u>: A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

Matrix Spike: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

<u>Surrogate</u>: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

<u>Continuing Calibration Verification:</u> The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

Validated by: Nicole Leja

SUMISHO OF

T. Budu	Relimquished by:	 1 200 - 605 JE 125	5	Tab Id: Samue Id-	G=Grab C=Composite	THE MILES WHEE SO SOFT	Groundwater	HCl 3-H <sub>2</sub> SO <sub>4</sub> Defonized Water	Toda I	Telephone (41) 784-3530	(	ECS - ACALOUM	PECTRUM ANALYTH  FACTOR  HANIBAL TECHNO	
116.1 11 KE ET 18.12	Received by: Date: Time:	0	5	Type Matrix # of Y f of At f of Cl	DAV nher (	وجهان	NEW ANA	# HNO, 5=NaOH 6 Ascorbic Acid 7=CH-OH- H=	P.O. No.: RON:			Invoice To: Same	Page 1 of 1	CHAIN OF CUSTODY RECORD
0.4	Temp°C   FDD Format	XXXXX		Henry	₽ĵ (		Analyses: MADE! MCP CAM Report Yes DNot	List preservative code below: Q.U.QC Reporting Notes:	Sampler(s): P. Name	Location: Chicopee State: MA	Site Name: Kune Scrap Iron Metal In	Project No. 01-215-977,000	Min. 24-hour notification needed for rushes. Samples disposed of after 60 days unless otherwise instructed.	

Report Date: 05-Jan-15 13:57



Final Report ☐ Re-Issued Report □ Revised Report

Laboratory Report

**Environmental Compliance Services** 588 Silver Street Agawam, MA 01001

Project #: 01-215977:13.00 Atm: Todd Donze

Project: Kane Scrap Iron + Metal Inc - Chicopee, MA

Laboratory ID	Client Sample ID	<u>Matrix</u>	Date Sampled	Date Received
SC01481-01	DA-001	Storm Water	16-Dec-14 23:00	18-Dec-14 14:33
SC01481-02	DA-002	Storm Water	16-Dec-14 23:00	18-Dec-14 14:33

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received. All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110 Connecticut # PH-0777 Florida # E87600/E87936 Maine # MA138 New Hampshire # 2538 New Jersey # MA011/MA012 New York # 11393/11840 Pennsylvania # 68-04426/68-02924 Rhode Island #98 USDA # S-51435



Authorized by:

Nicole Leja Laboratory Director

Spectrum Analytical holds certification in the State of Massachusetts for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of Massachusetts does not offer certification for all analytes. Please refer to our website for specific certification holdings in each state.

Please note that this report contains 7 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Spectrum Analytical, Inc.

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Please contact the Laboratory or Technical Director at 800-789-9115 with any questions regarding the data contained in this laboratory report.

#### **CASE NARRATIVE:**

Data has been reported to the RDL. This report excludes estimated concentrations detected below the RDL and above the MDL (J-Flag).

All non-detects and all results below the reporting limit are reported as "<" (less than) the reporting limit in this report.

The samples were received 1.6 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of +/- 1.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

Analyses for Total Hardness, pH, and Total Residual Chlorine fall under the state of Pennsylvania code Chapter 252.6 accreditation by rule.

See below for any non-conformances and issues relating to quality control samples and/or sample analysis/matrix.

#### **HACH8000**

Samples:		
SC01481-01	DA-001	
Sample dilution red Chemical Oxygen	,	tion of target analytes to be within the instrument calibration range.
SC01481-02	DA-002	
Sample dilution rec Chemical Oxygen		ion of target analytes to be within the instrument calibration range,

# Sample Acceptance Check Form

Environmental Compliance Services - Agawam, MA

Client:

Project:	Kane Scrap Iron + Metal Inc - Chicopee, MA / 01-215977:13.00			
Work Order:	SC01481			
Sample(s) received on:	12/18/2014			
The following outlines th	e condition of samples for the attached Chain of Custody upon receipt.			
Were custody se Were custody se	·	¥9	N•	N/A
Were samples re	ceived at a temperature of ≤ 6°C?			
•	frigerated upon transfer to laboratory representative?			
	operly labeled (labels affixed to sample containers and include sample ID, site project number and the collection date)?			U
Were samples ac	companied by a Chain of Custody document?			
include sample l	ustody document include proper, full, and complete documentation, which shall  D, site location, and/or project number, date and time of collection, collector's name,  e, sample matrix and any special remarks concerning the sample?			
Did sample conta	ainer labels agree with Chain of Custody document?			
Were samples re	ceived within method-specific holding times?			

Sample Identification
DA-001
SC01481-01

Client Project # 01-215977:13.00

<u>Matrix</u> Storm Water Collection Date/Time 16-Dec-14 23:00 Received 18-Dec-14

SC01481													
CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Ce
Total Me	tals by EPA 200/6000 Se	ries Methods											
	Preservation	Field Preserved		N/A			1	EPA 200/6000 methods			JRA	1429930	
Total Met	tals by EPA 200 Series N	lethods											
7429-90-5	Aluminum	1.31		mg/l	0.0500	0.0171	1	EPA 200.7	29-Dec-14	02-Jan-15	edt	1430217	X
7440-70-2	Calcium	59.9		mg/l	0.200	0.128	1	•	•	31-Dec-14	*	•	×
7440-50-8	Copper	0.134		mg/l	0.0100	0.0036	1		•		•	•	>
7439-89-6	Iron	2.73		mg/l	0.0300	0.0180	1	•		05-Jan-15	•	•	X
7439-95-4	Magnesium	4.62		mg/l	0.0200	0.0075	1	•	•	02-Jan-15	•	•	×
7440-86-6	Zinc	0.253		mg/l	0.0100	0.0066	1	•	•	31-Dec-14	•	•	Х
General C	Chemistry Parameters												
	Hardness	169	HD	mg/l CaCO3	0.582	0.351	1	SM 2340B	29-Dec-14	02-Jan-15	edt	[CALC]	
	Chemical Oxygen Demand	407	GS1,LIV	mg/l	50.0	16.7	1	HACH8000	23-Dec-14	23-Dec-14	CAA/T	1430056	×
SC01481	-02			01-2159	77.15.00		Storm Wa		-Dec-14 23		10-	Dec-14	
CAS No.	Analyte(s)	Result	E1										
			Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cei
Total Met	als by EPA 200/6000 Ser	ries Methods	riag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cei
Fotal Met	als by EPA 200/6000 Ser Preservation	ries Methods Field Preserved	riag	Units N/A	*RDL	MDL	Dilution 1	Method Ref.  EPA 200/6000 methods	Prepared	Analyzed		Batch 1429930	Cei
	•	Field Preserved	riag		*RDL	MDL		EPA 200/6000	Prepared	Analyzed			Cei
Γotal Meta	Preservation	Field Preserved	rtag		*RDL	<i>MDL</i> 0.0171		EPA 200/6000	Prepared 29-Dec-14				
Γotal Met 429-90-5	Preservation als by EPA 200 Series M	Fleid Preserved lethods	rag	N/A			1	EPA 200/6000 methods			JRA	1429930	x
Fotal Met 429-90-5 440-70-2	Preservation  als by EPA 200 Series M  Aluminum	Field Preserved lethods 0.944	rag	N/A mg/l	0.0500	0.0171	1	EPA 200/6000 methods EPA 200.7		02-Jan-15	JRA	1429930	Cei X X
Fotal Meta 429-90-5 440-70-2 440-50-8	Preservation  als by EPA 200 Series M  Aluminum  Calcium	Field Preserved lethods 0.944 51.6	rag	N/A mg/l mg/l	0.0500 0.200	0.0171 0.128	1 1 1	EPA 200/6000 methods EPA 200.7		02-Jan-15	JRA	1429930	×××
Fotal Met: 429-90-5 440-70-2 440-50-8 439-89-6	Preservation  als by EPA 200 Series M  Aluminum  Calcium  Copper	Field Preserved lethods 0.944 51.6 0.0939	riag	N/A mg/l mg/l	0.0500 0.200 0.0100	0.0171 0.128 0.0036	1 1 1 1	EPA 200/6000 methods EPA 200.7	29-Dec-14	02-Jan-15 31-Dec-14	JRA	1429930	X X X
Total Met: 429-90-5 440-70-2 440-50-8 439-89-6 439-95-4	Preservation  als by EPA 200 Series M  Aluminum  Calcium  Copper  Iron	Field Preserved lethods 0.944 51.6 0.0939 1.89	riag	N/A mg/l mg/l mg/l mg/l	0.0500 0.200 0.0100 0.0300	0.0171 0.128 0.0038 0.0180	1 1 1 1 1	EPA 200/6000 methods EPA 200.7	29-Dec-14	02-Jan-15 31-Dec-14 " 05-Jan-15	JRA	1429930	×××××××××××××××××××××××××××××××××××××××
Fotal Met: 429-90-5 440-70-2 440-50-8 439-89-6 439-95-4 440-68-6	Preservation  als by EPA 200 Series M  Aluminum  Calcium  Copper  Iron  Magnesium	Field Preserved lethods 0.944 51.6 0.0939 1.89	rag	N/A mg/l mg/l mg/l mg/l	0.0500 0.200 0.0100 0.0300 0.0200	0.0171 0.128 0.0036 0.0180 0.0075	1 1 1 1 1	EPA 200/6000 methods EPA 200.7	29-Dec-14 "	02-Jan-15 31-Deo-14 " 05-Jan-15 02-Jan-15	JRA	1429930	×××××××××××××××××××××××××××××××××××××××
Total Met: 7429-90-5 7440-70-2 7440-50-8 7439-89-8 7439-95-4 7440-68-6	Preservation  als by EPA 200 Series M  Aluminum  Calcium  Copper  Iron  Magnesium  Zinc	Field Preserved lethods 0.944 51.6 0.0939 1.89	HD	N/A mg/l mg/l mg/l mg/l	0.0500 0.200 0.0100 0.0300 0.0200	0.0171 0.128 0.0036 0.0180 0.0075	1 1 1 1 1	EPA 200/6000 methods EPA 200.7	29-Dec-14 "	02-Jan-15 31-Dec-14 " 05-Jan-15 02-Jan-15 31-Dec-14	JRA	1429930	×

# Total Metals by EPA 200 Series Methods - Quality Control

					Spike	Source		%REC		RPD
Analyte(s)	Result	Flag	Units	*RDL	Level	Result	%REC	Limits	RPD	Limit
Batch 1430217 - EPA 200 Series										
Blank (1430217-BLK1)					Po	epared: 29-	Dec-14 An	alyzed: 02-J	an-15	
Magnesium	< 0.0200		mg/l	0,0200						
Iron	< 0.0300		mg/l	0.0300						
Zinc	< 0.0100		mg/l	0.0100						
Aluminum	< 0.0500		mg/l	0.0500						
Calcium	< 0.200		mg/l	0.200						
Copper	< 0.0100		mg/l	0.0100						
LCS (1430217-BS1)					Pre	epared; 29-	Dec-14 An	alyzed: 31-D	ec-14	
Zinc	2.49		mg/l	0.0100	2.50		100	85-115		
Magnesium	2.51		mg/l	0.0200	2.50		100	85-115		
Iron	2.62		mg/l	0.0300	2.50		105	85-115		
Aluminum	2.66		mg/l	0.0500	2.50		106	85-115		
Calcium	12.0		mg/l	0.200	12.5		96	85-115		
Copper	2.56		mg/l	0.0100	2.50		102	85-115		

# General Chemistry Parameters - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1430056 - General Preparation			er o dirigi							
Blank (1430056-BLK1)					<u>Pr</u>	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	< 5.00		mg/l	5.00						
LCS (1430056-BS1)					Pu	A & berson	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	46.5		mg/l	5.00	50.Q		93	90-110		
Calibration Blank (1430056-CCB1)					21	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	-1.01		mg/l							
Calibration Blank (1430056-CCB2)					Ec	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	2.17		m <b>g</b> /l							
Calibration Blank (1430056-CCB3)					Pre	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	-1.40		mg/l							
Calibration Check (1430056-CCV1)					Pre	pared & A	nalyzed: 23-	Dec-14		
Chemical Oxygen Demand	47.9		mg/l	5.00	50.0		96	90-110		
Calibration Check (1430056-CCV2)					Ecs	pered & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	47.0		mg/l	5.00	50.0		94	90-110		
Calibration Check (1430058-CCV3)					Eu	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	46.8		mg/l	5,00	50.0		94	90-110		
<u>Duplicate (1430056-DUP1)</u>		Sc	urce: 90	01481-02	P.c.	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	237		mg/l	10.0		236			0.1	20
Matrix Spike (1430056-MS1)		So	urce: SC	01481-02	Pro-	pared & A	nalyzed: 23	Dec-14		
Chemical Oxygen Demand	334		mg/l	10,0	100	236	98	80-120		
Matrix Spike Dup (1430056-MSD1)		30	urce: SC	01481-02	<u>Pre</u>	pared & A	nalyzed: 23-	Dec-14		
Chemical Oxygen Demand	331		mg/l	10.0	100	236	95	80-120	0.9	20
Reference (1430056-SRM1)					Pre	pared & Ar	nalyzed: 23-	Dec-14		
Chemical Oxygen Demand	47.3		mg/l	5.00	50.0		95	79-117		

#### Notes and Definitions

GS1 Sample dilution required for high concentration of target analytes to be within the instrument calibration range.

dry Sample results reported on a dry weight basis

NR Not Reported

RPD Relative Percent Difference

LIV The initial volume for this sample has been reduced due to sample matrix and/or historical data therefore elevating the

reporting limit.

HD Total Hardness is a calculation based on the reported values of Ca and Mg.

<u>Laboratory Control Sample (LCS)</u>: A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

<u>Matrix Spike</u>: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

<u>Surrogate</u>: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

Continuing Calibration Verification: The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

Validated by: June O'Connor Nicole Leja

		1. Juny		Refinguished by:					V 08 DA-002	SCOKIBIKI DA - 001	Lab ID: Sample ID:	G= Cirab	x1= Stormuzzter v=	O=Oil SO=Soil SL=Sludge A=Indom/Amhunt Au	BW=Dinking Water GW=Groundwater SW=S		F=Field Filtered F=N3,52O, 2=HC) 3=H,5O, 7=CH3OH 8=NaHSO, 9=Deionized Water 10=H,PO <sub>4</sub>	Project Mer: Tolked DOWLE	Telephone * (413) 784-3520	Mary Control	وعالم	SPECTRUM AVALYTICAL INC. PANNIBAL TECHNOLOGY			
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		12/18/14 1433	1275-11 1227	Date: Time:					4	2	# of		r Glass Glass		Containers		No. Acid	(hmerc/RON, OOO			SAME	Page 1 of 1	CHAIN OF CUSTODY REC		
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ATTACHMENT B
September 10, 2015 Laboratory Analytical Report



# Spectrum Analytical

₩.	Final Report
	Re-Issued Report
	Revised Report
Re	port Date:
22	-Sep-15 12:45

### Laboratory Report

Environmental Compliance Services 588 Silver Street Agawam, MA 01001

Attn: Todd Donze

Project: Kane Scrap Iron + Metal Inc - Chicopee, MA

Project #: 01-215977.15.00

Laboratory IDClient Sample IDMatrixDate SampledDate ReceivedSC12297-01HardnessSurface Water10-Sep-15 11:0010-Sep-15 11:30

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received.

All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110 Connecticut # PH-0777 Florida # E87936 Maine # MA138 New Hampshire # 2538 New Jersey # MA011 New York # 11393 Pennsylvania # 68-04426/68-02924 Rhode Island # LAO00098 USDA # S-51435



Authorized by:

Nicole Leja Laboratory Director

Juiole Leja

Eurofins Spectrum Analytical holds certification in the State of Massachusetts for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of Massachusetts does not offer certification for all analytes. Please refer to our website for specific certification holdings in each state.

Please note that this report contains 7 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Eurofins Spectrum Analytical, Inc.

Eurofins Spectrum Analytical, Inc. is a NELAC accredited laboratory organization and meets NELAC testing standards. Use of the NELAC logo however does not insure that Spectrum is currently accredited for the specific method or analyte indicated. Please refer to our Quality'web page at www.spectrum-analytical.com for a full listing of our current certifications and fields of accreditation. States in which Spectrum Analytical, Inc. holds NELAC certification are New York, New Hampshire, New Jersey, Pennsylvania and Florida. All analytical work for Volatile Organic and Air analysis are transferred to and conducted at our 830 Silver Street location (PA-68-04426).

Please contact the Laboratory or Technical Director at 800-789-9115 with any questions regarding the data contained in this laboratory report.

#### **CASE NARRATIVE:**

Data has been reported to the RDL. This report excludes estimated concentrations detected below the RDL and above the MDL (J-Flag).

All non-detects and all results below the reporting limit are reported as "<" (less than) the reporting limit in this report.

The samples were received 0.0 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of  $\pm$ 1.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

Analyses for Total Hardness, pH, and Total Residual Chlorine fall under the state of Pennsylvania code Chapter 252.6 accreditation by rule.

There is no relevant protocol-specific QC and/or performance standards non-conformances to report.

# Sample Acceptance Check Form

Client:	Environmental Compliance Services - Agawam, MA
Project:	Kane Scrap Iron + Metal Inc - Chicopee, MA / 01-215977.15.00
Work Order:	SC12297
Sample(s) received on:	9/10/2015

# The following outlines the condition of samples for the attached Chain of Custody upon receipt.

	Yes	No	N/A
Were custody seals present?		abla	
Were custody seals intact?			
Were samples received at a temperature of $\leq 6^{\circ}$ C?	abla		
Were samples cooled on ice upon transfer to laboratory representative?			
Were sample containers received intact?			
Were samples properly labeled (labels affixed to sample containers and include sample ID, site location, and/or project number and the collection date)?			
Were samples accompanied by a Chain of Custody document?			
Does Chain of Custody document include proper, full, and complete documentation, which shall include sample ID, site location, and/or project number, date and time of collection, collector's name, preservation type, sample matrix and any special remarks concerning the sample?			
Did sample container labels agree with Chain of Custody document?			
Were samples received within method-specific holding times?			

# **Summary of Hits**

Lab ID: SC12297-01

Client ID: Hardness

Parameter	Result	Flag Reporting Limit	Units	Analytical Method
Calcium	14.8	0.100	mg/l	EPA 200.7
Magnesium	1.91	0.0100	mg/l	EPA 200.7
Hardness	44.7	0.291	mg/l CaCO3	SM 2340B

Please note that because there are no reporting limits associated with hazardous waste characterizations or micro analyses, this summary does not include hits from these analyses if included in this work order.

Sample Identification	
Hardness	

SC12297-01

Client Project # 01-215977.15.00

<u>Matrix</u> Surface Water Collection Date/Time 10-Sep-15 11:00

Received 10-Sep-15

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert
<del></del>			7.87				C. C. Santoni						3-70-01
Iotal Meti	els by EPA 200/6000 S Preservation	Field Preserved		N/A			1	EPA 200/6000 methods			LNB	1517355	1
Total Meta	als by EPA 200 Series	Methods											
7440-70-2	Calcium	14.8		നൃ/ി	0,100	0.0642	1	EPA 200.7	15-Sep-15	17-Sep-15	tbc	1517515	×
7439-95-4	Magnesium	1.91		mg/l	0.0100	0.0038	1	•	•		•	•	x
General C	hemistry Parameters												
	Hardness	44.7	HD	mg/l CaGQ3	0.291	0.176	1	SM 2340B	15-Sep-15	17-Sep-15	tbc	[CALC]	

# Total Metals by EPA 200 Series Methods - Quality Control

Analyte(s)	Result	Flag	Units	•RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1517515 - EPA 200 Series			····							<del></del>
Blank (1517515-BLK1)					Po	pared: 15-	Sep-15 An	alvzad: 17-S	ep-15	
Magnesium	< 0.0100		ing/l	0.0100						
Calcium	< 0.100		mg/l	0.100						
LCS (1517515-BS1)					Pre	pared: 15-	Seo-15 An	alvzed: 17-S	ep-15	
Magnesium	1.23		rng/l	0.0100	1.25		98	85-115	~~~~	
Calcium	6.19		mg/l	0.100	6.25		99	85-115		
<u> Duplicate (1517515-0UP1)</u>			Source: 50	212297-01	Pre	pared: 15-	Sep-15 An	alvzed: 17-S	ep-15	
Magnesium	1.87		mg/l	0.0100		1.91			2	20
Calcium	14.5		mg/l	0.100		14.8			2	20
Matrix Spike (1517515-MS1)			Source: SC	12297-01	Pre	pared: 15-8	Sep-15 An	alvzed: 17-S	ep-15	
Magnesium	3.06		mg/l	0.0100	1.25	1.91	92	70-130		
Calcium	20.4		mg/l	0.100	6.25	14.8	91	70-130		
Post Spike (1517515-PS1)			Source: SC	12297-01	Pre	pared: 15-5	3ep-15 An	alvzed: 17-S	ep-15	
Magnesium	3.03		mg/l	0.0100	1,25	1.91	90	85-115		
Calcium	20.3		mg/l	0.100	6.25	14.8	89	85-115		

#### **Notes and Definitions**

dry Sample results reported on a dry weight basis

NR Not Reported

RPD Relative Percent Difference

HD Total Hardness is a calculation based on the reported values of Ca and Mg.

<u>Laboratory Control Sample (LCS)</u>: A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

Matrix Spike: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

<u>Surrogate</u>: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

<u>Continuing Calibration Verification:</u> The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

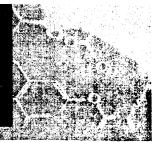
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Analysis MADES MCP CAM Report TYPE CTOPH SCP Report TYPE		Cantainers	Ca		WW-Waste Water	SW=Sarface Water WW	GW=Groundwater SW=	DW=Dinking Water
mailtraint connection to the professional desired	11/4							
List Preservative Code below: QA/QC Reporting Notes:	Lint	,		6=Ascorbic Acid 12=	HOWA L	4=HNO,	a <sub>2</sub> S2O <sub>3</sub> Z=HCl 9-Deignized Water 1	F=Field Filtered 1=N 7=CH3OH \$=NaHSO.
The Man	Tr.	extre	Quote-RQN:		P.O.No.:		3) 127-353C	Project Mgr.
Location: Chicopee Scate		1						
Sin Name: Kive Surp Iran and Metal							Agassa	EC
Project No. 01-215977.15.00			Same		Invoice To:		Donze	Report To:
All TAT's subject to laboratory approval Min. 24-far notification metrical for rushed Samples disposed after 60 days unless otherwise instructed.			/ of _	Page			ACHAOLOGA ANALICAT INC.	SPECTRUM AN
Standard TAT - 7 to 10 business days  Rush TAT - Date Needed:	CORD	CHAIN OF CUSTODY RECORD	CUST	N OF	СНАП			ïſû
Special Handling:								

# ATTACHMENT C

Cover Letters and UPS Receipts for September 25, 2015 and October 1, 2015
Submittals to EPA and MassDEP



588 Silver Street, Agawam, MA 01001 tel 413,789,3530 fax 413,789,2776 www.ecsconsult.com

U.S. Environmental Protection Agency Office of Water, Water Permits Division Code 4203M, ATTN: MSGP Reports Pennsylvania Avenue, NW Washington, DC 20460 October 1, 2015
Project No. 01-215977
Document No. 45044

Re: EPA NPDES Stormwater MSGP Quarterly Benchmark Monitoring Results

Kane Scrap Iron & Metal, Inc. - 184 East Meadow Street, Chicopee, MA (MAR05DY90)

To Whom It May Concern:

Environmental Compliance Services, Inc. (ECS) is submitting the attached historical stormwater benchmark monitoring results on behalf of Kane Scrap Iron & Metal, Inc. (Kane) located at 184 East Meadow Street in Chicopee, Massachusetts (MAR05DY90). Specifically, stormwater monitoring results for the fourth quarter of 2011, second quarter of 2012, second quarter of 2013 and fourth quarter of 2014 are attached. During a recent records review, it was determined that these results may not have been submitted to EPA.

If you have any questions or comments, please contact us.

Sincerely,

ENVIRONMENTAL COMPLIANCE SERVICES, INC.

Matthew Reiser, CHMM Compliance Specialist

MR/ajr Attachments

cc: Robert Kane, Jr., Kane Scrap Iron & Metal, Inc.

Amy Ringuette <aringuette@ecsconsult.com>

# **UPS Delivery Notification, Tracking Number 1Z091F0W0398461430**

1 message

UPS Quantum View <auto-notify@ups.com>

Tue, Oct 6, 2015 at 11:06 AM

Reply-To: auto-notify@ups.com To: aringuette@ecsconsult.com

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Important Delivery Information

**Tracking Number:** 12091F0W0398461430 **Delivery Date / Time:** 06-October-2015 / 11:00 AM

Delivery Location Left At: FRONT DESK

Signed by: MAY

ŲS

#### **Shipment Detail**

Ship To: MSGP Reports U.S. EPA 1200 PENNSYLVANIA AV€ NW ROOM 7420 WASHINGTON DC 20460

Number of Packages:

UPS Service: GROUND Weight: 1.0 LBS

Transaction Reference Number: 2|5977/45044 - ajr Transaction Reference Number: Shipment Reference #2 © 2015 United Parcel Service of America, Inc. UPS, the UPS brandmark, and the color brown are trademarks of United Parcel Service of America, Inc. All rights reserved.

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### ENVIRONMENTAL COMPLIANCE SERVICES, INC

588 Silver Street, Agawam, MA 01001 - tel 413, 789,3530 - fax 413,789,2776 - www.ecsconsult.com

MassDEP - Western Region 436 Dwight Street Springfield, MA 01103 September 25, 2015 Project No. 01-215977 Document No. 45004

Attn: Paul Nietupski

RE: EPA NPDES Stormwater MSGP Benchmark Monitoring Results

Kane Scrap Iron & Metal, Inc. 184 East Meadow Street Chicopee, Massachusetts

Dear Mr. Nietupski:

Environmental Compliance Services, Inc. (ECS) is submitting the attached stormwater benchmark monitoring results on behalf of Kane Scrap Iron & Metal, Inc. (Kane) located at 184 East Meadow Street in Chicopee, Massachusetts. As you may be aware, per the EPA NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (Stormwater MSGP), the results of any monitoring required by the MSGP must be sent to the Regional Office of the DEP where the monitoring identifies violations of any benchmarks for any parameter for which monitoring is required.

It should be noted that a Stormwater Pollution Prevention (SWPP) Plan has been prepared for and implemented by Kane. This SWPP Plan describes the control measures, e.g., good housekeeping, exposure minimization, spill prevention and response, that Kane has implemented in an effort to minimize the likelihood of off-site stormwater pollution. Additionally, Kane has and continues to identify control measures and corrective actions aimed at minimizing the pollutants in its stormwater discharge. A synopsis of these corrective actions to date include:

#### 2011:

Sediment blockers in the catch basins that discharge stormwater off site;

#### 2012:

- Bi-weekly manual sweeping within a thirty foot radius around these catch basins;
- Weekly sweeping of paved areas via a purchased mobile street sweeper;
- Installation of asphalt curbing along non-paved areas;

#### 2013:

- Continued weekly sweeping of paved areas via a purchased mobile street sweeper;
- Installation of silt fence/straw bale barriers around unpaved and production/storage areas;

#### 2014:

- Continued weekly sweeping of paved areas via a purchased mobile street sweeper;
- Evaluation of filtration inserts for eatch basins that discharge stormwater off site;

#### 2015:

- Continued weekly sweeping of paved areas via a purchased mobile street sweeper; and
- Purchase of CleanWay Storm Clean catch basin filtration inserts for these catch basins.

Through the employ of these control measures, Kane has reduced the levels of pollutants in its stormwater discharge. As the CleanWay Storm Clean catch basin filtration inserts are made to order, Kane hopes to receive and install them by the end of the year. It is anticipated that these filtration devices will continue to reduce the levels of pollutants in stormwater discharge from the facility.

Project No. 01-215977/Document No. 45004 Paul Nietupski MassDEP - Western Region September 25, 2015

Page 2

If you have any questions or comments, please contact us.

Sincerely,

ENVIRONMENTAL COMPLIANCE SERVICES, INC.

Matthew Reiser, CHMM

Compliance Specialist

MR/kab Attachments

cc: Robert Kane, Jr., Kane Scrap Iron & Metal, Inc.



### Kelly Blase <kblase@ecsconsult.com>

## UPS Delivery Notification, Tracking Number 1Z091F0W0398356410

1 message

UPS Quantum View <auto-notify@ups.com>

Reply-To: auto-notify@ups.com To: kblase@ecsconsult.com Mon, Sep 28, 2015 at 10:14 AM



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Important Delivery Information

**Tracking Number:** 1Z091F0W0398356410

Delivery Date / Time: 28-September-2015 / 10:05 AM

**Delivery Location:** OFFICE **Signed by:** LEPLANTE

### **Shipment Detail**

Ship To: Mr. Paul Nietupski

MassDEP 436 DWIGHT ST ROOM 500 SPRINGFIELD MA

01103 US

Number of Packages:

UPS Service: GROUND Weight: 1.0 LBS

Transaction Reference Number: Shipment Reference #1

Transaction Reference Number: Shipment Reference #2/215977/45004



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ATTACHMENT D
2012, 2013 and 2014 Annual Reports

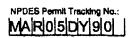


United States Environmental Protection Agency

WASHINGTON, DC 20460
Annual Reporting Form
A. GENERAL INFORMATION
1. Facility Name:
2. NPDES Permit Tracking No.: MAR05DY90
3. Facility Physical Address:
a Street: 184 East Meladom Street   1   1   1
b. City: Chicopele
4. Lead Inspectors Name: Robert E. Kane IIII Title: Non-Ferrous Metals Manager
Additional Inspectors Name(s): Toddd Donze
5. Contact Person: Robert E. Kane IIII Non-Ferrous Metals Manager
Phone: 4 13 - 594 - 5 160 Ext.       E-meil:
8. Inspection Date: 0 9 / 2 7 / 2 0 1 2
8. GENERAL INSPECTION FINDINGS
1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?  INO
If NO, describe why not:
NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in 8.2 or 8.3 below where pollutants may be exposed to stormwater.
2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP?   YES  NO
If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP?   YES   NO
If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:
4. Did you review stormweter monitoring data as part of this inapportion to identify potential pollutant hot apote?   YES NO NA, no monitoring performed
If YES, summarize the findings of that review and describe any additional inequation activities resulting from this review:
The facility quarterly storm water discharge visual axams and benchmark monitoring data for precipitation/sample events occurring
on December 22, 2011, March 2, 2012, June 22, 2012, and September 18, 2012 were reviewed at the time of the annual inspection. No potential issues and/or concerns were identified in regards to information documented via quarterly visual inspection forms. However, the applicable MSGP standards for COD, TSS, AJ, Cu, Fe, Pb, and Zn were exceeded in samples collected at
DA-001 and DA-002 on December 22, 2011, March 2, 2012, and June 22, 2012.
5. Describe any evidence of pullutants entering the drainage system or discressing to surface waters, and the condition of and ground outfalls, including flow discipation measures to prevent securing:
Negligible amounts of fine sand/sediment were observed at paved locations encompassing DA-001 and DA-002 and other various areas throughout the Kane facility property during this inspection. No wind blown litter or other indicators of pollutants which could potentially impact storm water were observed.
B. Have you taken or do you plan to take any corrective actions, এই apecified in Part 3 of this parms, alice your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual request. Including any consuctive actions (dentified as a result of this gunual comprehensive attermination?  ☑ YES □ NO
If YES, how many conditions requiring review for correction sellon as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?
NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a regult of this comprehensive stormwater inspection.

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS			
Complete one block for each industrial activity area where poliutants may be exposed to stormwater. Copy this page for additional industrial activity areas.			
In reviewing each area, you should consider:  Industrial materials, residue, or treah that may have or could come into contact with stormwater;  Leaks or spills from industrial equipment, drums, tanks, and other containers;  Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and  Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.			
INDUSTRIAL ACTIVITY AREA 001 :	المدادة المتعالمة المتالة المدار		
1. Brief Description:			
Negligible amounts of fine sand/sediment were observed at the paved area encompassing DA-001 and other various areas throughout the Kane facility property during this inspection.			
Are any control measures in need of maintenance or repair?	□ YES	₽ NO	
S. Have any control measures falled and require replacement?	☐ YES	ZI NO	
4. Are any additional/revised control measures necessary in this grea?	Z YES	□ NO	
If YES to any of these three questions, provide a description of the problem: Corrective Action Form)	(Any nace	easily corrective actions should be described on the attached	
Facility personnel anticipate to implement/schedule more frequareas adjacent to DA-001. When deemed unreasonable to enareas within a thirty foot radius of DA-001 manually via broom silt fence/straw bale barriers to encompass unpaved and produced to the compass unpaved to the compass	nployee . In addit	e street sweeper, on a bi-weekly basis Kane shall sweep ion, Kane facility management anticipates the installation of	
INDUSTRIAL ACTIVITY AREA <u>DA-002</u> :			
1. Brief Description:			
Negligible amounts of fine sand/sediment were observed at the throughout the Kane facility property during this inspection.	e paved	ares encompassing DA-002 and other various areas	
2. Are any central measures in need of maintanance or repair?	☐ YES	ZI NO	
3. Have any control measures failed and require replacement?	☐ YE8	21 NO	
4. Are any additional/revised c necessary in this area?	Z YES	□ NO	
If YES to any of these three queations, provide a description of the problem: Corrective Action Form)	(Any nece	ssary corrective actions should be described on the attached	
Facility personnel anticipate to implement/schedule more frequareas adjacent to DA-002. When deemed unreasonable to en areas within a thirty foot radius of DA-002 menually via broom, sitt fence/straw bale barriers to encompass unpaved and produced.	nployee i In addit	a street sweeper, on a bi-weekly basis Kane shall sweep ion, Kane facility management anticipates the installation of	
INDUSTRIAL ACTIVITY AREA:			
Brief Dascription:			
2. Are any control measures in need of maintenance or repair?	YES	[] NO	
3. Have any control measures failed and require replacement?	YES	□ NO	
4. Are any additional/revised BMPs necessary in this area?	YES	Пио	
if YES to any of these three questions, provide a description of the problem: Corrective Action Form)	(Апу пасе	ssary corrective actions should be described on the attached	



		NOTE: Copy this page and attach additional pages as necessary
INDUSTRIAL ACTIVITY AREA:		
Brief Description:		
2. Are any control measures in need of maintenance or repair?	[] YE\$	□ NO
3. Have any control measures falled and require replacement?	☐ YES	NO
4. Are any additional/revised BMPs necessary in this area?	TYES	Пю
If YES to any of these three questions, provide a description o Corrective Action Form)	of the problem:	: (Any necessary corrective actions should be described on the attached
INDUSTRIAL ACTIVITY AREA:		
1. Brief Description:		
1. one Description.		
Are any control measures in need of maintenance or repair?	☐ YES	□ NO
Have any control measures failed and require replacement?	☐ YES	□ NO
4. Are any additional/revised BMPs necessary in this area?	☐ YES	□ NO
If YES to any of these three questions, provide a description o		: (Any necessary corrective actions should be described on the attached
Corrective Action Form)	· · · · ·	
INDUSTRIAL ACTIVITY AREA:		
1. Brief Description:		
A y to	M VEC	PN NA
Are any control measures in need of maintenance or repair?     Have any control measures failed and require replacement?	☐ YES	□ NO
Are any additional/revised BMPs necessary in this area?	YES	□ NO
		(Any necessary corrective actions should be described on the attached
Corrective Action Form)	* W	(vii) indeeding out of the control o

D. CORRECTIVE ACTIONS				
Complete this page for each specific condition requiring a currective action or a review determining that ne corrective action is needed. Copy this page for additional corrective actions or reviews.				
include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.				
1. Corrective Action # 01 of 01 for this reparting pariod.				
2. is this corrective action:				
☑ An update on a corrective extion from a previous samual (specific) or				
☐ A new corrective sation?				
3. Identify the condition(s) triggering the need for this review:				
☐ Unauthorized releases or discharge				
☐ humaric attituent ilmitation exceedance				
☑ Control measures inadequate to meet applicable water quality signdards				
Control measures inadequate to meet non-numeric effluent limitations				
Control measures not properly operated of maintained				
Change in facility operations necessitated change in control mossures				
☑ Avarage banchmark value exceedance				
Other (describe):				
4. Briefly seacribs the nature of the problem identified:				
It is anticipated that the four (4) quarter average for CQD, TSS, AI, Cu, Fe, Pb, and Zn will exceed the applicable MSGP benchmark monitoring standards regarding samples collected at DA-001and DA-002.				
5. Date problem identified: 09/27/2012				
6. How problem was identified:				
Comprehensive site inspection				
Cuanarly visual seasesment				
☐ Routine facility inspection				
Benchmark monitoring      New York of State of hand authorities.				
☐ Notification by EPA or State or local authorities				
Other (describe):  7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are received, besis for that determination:				
Facility personnel anticipate to implement/schedule more frequent sweeping control measures of paved areas, with empathise to areas adjacent to DA-001 and DA-002. As described above, on a bi-weekly basis Kane shall sweep areas encompassing a thirty foot radius of DA-001 and DA-002 manually via broom. In addition, Kane facility management anticipates the installation of silt fence/straw bale barriers to contain unpaved and production/storage areas.				
8. Did/will this corrective action require modification of your SWPPP? [] YES [2] NO				
9. Date corrective scrion initiated: 09/27/2012				
10. Date correction action completed:				
11. If corrective action not yet completed, provise कि तारोहि of corrective action of the surpression and describe any remaining steps (including timetrames associated with each step) (१९२०२४४४४ ६२ ६००५/३४६ इन्स्टर्गापके इन्स्टर्गापके इन्स्टर्गापके				
As soon as possible and subsequent deaning activities to be performed on a bi-waekly basis and/or as deamed necessary (See Sections above).				

E.	ANNUAL REPORT CERTIFICATION
1. C	ompäance Certification
	Do you carify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the requite of this inspection, to the best of your knowledge, you are in compliance with the permit? IF YES IND
	If NO, summanzs why you are not in compliance with the permit:
2, A	nnual Report Certification
as: sy:	artify under pensity of law that this document and all attachments were propared under my direction or supervision in accordance with a system designed to turn that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the item, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, acquirate, it complete. I am aware that there are significant panalties for submitting tales information, including the possibility of line and imprisonment for knowing lations.
	rorized Representative Robert E. Kane IIII Non-Ferrous Metals Manager
Sigr	atura S Date Signed: C1/21/12



United States Environmental Protection Agency
Washington, DC 20460

WELLY.
Annual Reporting Form
A. GENERAL INFORMATION
1. Facility Name: Kane Scrap II ron and Metali, Inc.
2. NPDES Permit Tracking No.: MAR05DY90
3. Facility Physical Address:
a. Street: 184 Bast Meadow Street
b. City: Chicopee
4. Lead Inspectors Name: Robert E. Kane IIII Title: Na.J-Askerby 145 Hall Manuagor
Additional Inspectors Name(s): Todd Donze     Environ. Consultant
5. Contact Person: Robert E. Kane IIII Tibe: Non-Torreuk metals thankager
Phone: 413-594-5160 Ext
6. Inspection Date: 0 9 / 2 7 / 2 0 1 3
B. GENERAL INSPECTION FINDINGS
1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?  [2] YES [1] NO
If NO, describe why not:
NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in 8.2 or 8.3 below where pollutants may be exposed to stormwater.
2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? YES VINO
If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place;

3 Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? 🔲 YES 🛂 NO
If YES, describe these sources of stormwater or non-stormwater poliutants expected to be present in these discharges, and any control measures in place:
4. Did you review stormweter monitoring data as part of this inspection to identify potential politiant hat spots? 💆 YES 📋 NO 🗀 NA, no manitoring performed
if YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:
The facility quarterly storm water discharge visual exams and benchmark monitoring data for precipitation/eample events occurring on December 16, 2012, February 23, 2013, June 28, 2013, and September 21, 2013 were reviewed at the time of the annual inspection. Note that the benchmark monitoring data concerning the September 21, 2013 sample event was not available at the time of the annual inspection and consequently, these results were reviewed at a later date. No potential issues and/or concerns
were identified in regards to information documented via quarterly visual inspection forms. However, the applicable MSGP standards for COD, Al, Cu, Fe, and/or Zn were exceeded in samples collected at DA-001 and/or DA-002 on December 16, 2012, February 23, 2013, June 28, 2013, and/or September 21, 2013. It should be noted that the four (4) quarter average for TSS and Pb at DA-001 and DA-002 did not exceed the applicable MSGP Benchmark Standards; therefore, Kane has fulfilled the monitoring
requirements regarding these parameters for the remainder of the current permit term.
5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outlalls, including flow dissipation measures to prevent scouring.
Negligible amounts of fine sand/sediment were observed at paved locations encompassing DA-001 and DA-002 and other various areas throughout the Kane facility property during this inspection. No wind blown litter and/or other indicators of pollutants which could potentially impact storm water were appeared.
6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report authorisation (or since you received authorization to discharge under this permit if this is your first annual reports. Including any corrective actions (dentitled as a result of this annual comprehensive site inspection?  Z YES  NO
If YES, how many conditions requiring review for correction as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?
NOTE: Complete the attached Corrective Action Form (Section D) for each continue Section Sections and applications identified as a result of this comprehensive stormwater inspection.

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS		
Complete one block for each industrial activity area where pollutants may	be expose	d to stormwater. Copy this page for additional industrial activity areas.
In reviewing each area, you should consider:  Industrial materials, residue, or trash that may have or could come in  Leaks or spills from industrial equipment, drums, tanks, and other co  Offsite tracking of industrial or waste materials from areas of no expo  Tracking or blowing of raw, final, or waste materials from areas of no	ontainers; osure to exp	posed areas; and
INDUSTRIAL ACTIVITY AREA 001 :	garden de servicione e	The second secon
Brief Description:		
Negligible amounts of fine sand/sediment were observed at the throughout the Kane facility property during this inspection.	e paved	area encompassing DA-001 and other various areas
2. Are any control measures in need of maintenance or repair?	□ YES	Ø NO
3. Have any control measures failed and require replacement?	TYES	ZI NO
4. Are any additional/revised control measures necessary in this area?	Z YES	[] NO
If YES to any of these three questions, provide a description of the problems Corrective Action Form)	(Any nece	resary corrective actions should be described on the attached
Facility personnel anticipate to implement/schedule more frequences treet sweeper, with empathise to areas adjacent to DA-001, purchased a mobile street sweeper to complete bi-weekly sweepers to encompass production/storage areas.	Since the	e September 27, 2012 annual inspection, Kane has
INDUSTRIAL ACTIVITY AREA DA-002:	Hits dem acceptant to the splittable	
1. Brief Description:		
Negligible amounts of fine sand/sediment were observed at the throughout the Kane facility property during this inspaction.	e paved	area encompassing DA-002 and other various areas
Are any control measures in need of maintenance or repair?	C YES	Ø no
3. Have any control measures failed and require replacement?	☐ YES	Z no
4. Are any additional/revised c necessary in this area?	(Z) YES	□NO
If YES to any of these three questions, provide a description of the problem: Corrective Action Form)	(Any nece	ssary corrective actions should be described on the attached
Facility personnel anticipate to implement/schedule more frequent street sweeper, with empathise to areas adjacent to DA-002. purchased a mobile street sweeper to complete bi-weekly sweepers to encompass production/storage areas.	Since the	e September 27, 2012 annual inspection, Kane has
INDUSTRIAL ACTIVITY AREA:	***************************************	
Brief Description:		
2. Are any control measures in need of maintenance or repair?	T YES	Пио
3. Have any control measures failed and require replacement?	☐ YES	Пио
4. Are any additional/revised BMPs necessary in this area?	YES	Пио
If YES to any of these three questions, provide a description of the problem: Corrective Action Form)	(Any neces	ssary corrective actions should be described on the attached

	· <del></del>	NOTE: Copy this page and attach additional pages as necessary
INDUSTRIAL ACTIVITY AREA:		
Brief Description:		
2. Are any control measures in need of maintenance of repair?	TYES	□ NQ
3. Have any control measures failed and require replacement?	TYES	□ NO
4. Are any additional/revised BMPs necessary in this area?	TYES	D NO
	he problem:	(Any necessary corrective actions should be described on the attached
Corrective Action Form)		
INDUSTRIAL ACTIVITY AREA		
Brief Description:		
T. Bridi Bodonpitorii		
		•
Are any control measures in need of maintenance or repair?	T YES	[] NO
3. Have any control measures failed and require replacement?	☐ YES	□ NO
4. Are any additional/revised BMPs necessary in this area?	YES	Пио
	he problem:	(Any necessary corrective actions should be described on the attached
Corrective Action Form)		
INDUCTORAL ACTIVITY ADEA		
INDUSTRIAL ACTIVITY AREA:  1. Brief Description:		
1. Sher Description.		
2. Are any control messures in need of maintenance or repair?	() YES	m NO
3. Have any control measures falled and require replacement?	YES	[] NO
4 Are any additional/revised BMPs necessary in this area?	YES	□ NO
	he problem.	(Any necessary corrective actions should be described on the attached
Corrective Action Form)		
•		

Q. CORRECTIVE ACTIONS
Complete this page for each specific condition requiring a excrective action of a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.
Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.
1. Corrective Action # 0 1 of 0 1 for this reporting parted.
2. Is this corrective action:
☑ An update on a corrective action from a previous annual report; or
☐ A new corrective action?
3. Identify the condition(s) triggering the need for this review:
[] Unauthonzed release or discharge
D Numeric effluent limitation exceedance
Control measures in adequate to meet applicable water quality standards
Control measures inadequate to meet non-numeric officent limitations
Control measures not properly operated or mainteined
Change in facility operations necessitated change in control measures
☑ Average benchmark value exceptionice
Other (describe):
4. Briefly describe the nature of the problem identified:
The four (4) quarter average for COD, Al, Cu. Fq. and Zn have exceeded the applicable MSGP banchmark monitoring standards regarding samples collected at DA:001and DA 002. Note that these parameters have indicated a decreasing trend over time and with increased control measures.
5. Date problem identified: 09/27/2013
6. How problem was klentified:  Comprehensive site Inspection
☐ Quartery visual assessment
☐ Routine facility Inspection
☑ Benchmark monitoring
☐ Notification by EPA or State or local authorities
Other (describe):
7. Description of corrective action(s) taken or to be taken to aliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications graineded, basis for that determination:
Facility personnel anticipate to implement/schedule more frequent (weekly) sweeping control measures of paved areas via mobile street sweeper, with empathise to areas adjacent to DA-001 and DA-002. Since the September 27, 2012 annual inspection, Kane has purchased a mobile street sweeper to complete bi-weekly sweeping control measures and in addition, installed silt fence/straw bale barriers to encompass production/storage areas.
8. Did/will this corrective action require modification of your SWPPP? [] YES [] NO
9. Date corrective action initiated: 09/27/2013
10 Date correction action completed:// gr expected to be completed:
11. If corrective action not yet completed, provide the status of conductive action of the time of the corrective action and describe any remaining steps (including timeframes associated with each step) recessary to complete corrective action.
As soon as possible, sweeping control measures to be performed on a weekly basis and/or as deemed necessary(See Sections above).

E. ANNUAL REPORT CERTIFICATION
1. Compliance Certification
Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit?
If NO, summarize why you are not in compliance with the permit:
2. Annual Report Certification
I certify under penelty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Sased on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowling violations.
Authorized Representative Printed Name:  Robert E. Kane IIII Title: Non-Textous Mokes Mountain
Signalus Date Signed: 1 C 1 S

598 Silver Street, Agawam, MA 01001 - tel 413.789.3530 - fax 413.789.2776 - www.ecscomsult.com

Environmental Protection Agency
Office of Water, Water Permits Division
Code 4203M, ATTN: MSGP Reports
Pennsylvania Avenue, NW
Washington, D.C. 20460

October 1, 2014 Project No. 01-215977.14.0Q Document No.

RE:

NPDES Multi-Sector General Permit

Annual Storm Water Comprehensive Site Inspection

MSGP Tracking Number: MAR05DY90

### Dear Sir/Madam:

On behalf of Kane Scrap Iron and Metal, Inc. (Kane) and in accordance with the requirements of the 2008 Multi-Sector General Permit regarding Storm Water Discharge Associated with Industrial Activity (MSGP) under the National Pollutant Discharge Elimination System (NPDES), Environmental Compliance Services, Inc. (ECS) is providing the attached Annual Reporting Form for the 2013 — 2014 monitoring period associated with the facility located at 184 East Meadow Street in Chicopee, Massachusetts.

If you have any questions and/or concerns regarding any of this information, please do not hesatate to contact this office at (413) 789-3530 at your convenience.

Sincerely,

ENVIRONMENTAL COMPLIANCE SERVICES, INC.

Todd Donze

Environmental Scientist

United States Environmental Projection Agency

WASHINGTON, DC 2048D
Annual Reporting Form
A. GENERAL INFORMATION
1. Facility Name: Kane Scrap IIron and Matal, Inc.
2. NPDES Permit Tracking No.: MARO 5DY 90
3. Facility Physical Address:
a. Street: 184   目alsit   Melaidolm   Stirlett   1   1   1   1   1   1   1   1   1
b. City:  Chilcopele
4 Lead Inspectors Name: Robert E. Kane IIII Title: John-Francis Maha Hangan
Additional Inspectors Name(s): Toddd Donze
5. Coptact Person: FRO blert E. Kane IIII 11 11 11 11 11 11 11 11 11 11 11 1
Phone: 4 13 - 594 - 5160 Est       E-mail
8. Inspection Date: 09/29/2014
B. GENERAL INSPECTION FINDINGS
1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
II NO, describe why not:
NOTE: Complete Section C of this form for each industrial applying कार्य कार्यकार कार्य कार्यकार कार्य क्षेत्रिक रा क्षेत्र कार्यक त्र्वकार्यक्र का B.2 or B.3 below where pollutants may be exposed to stormwater.
2. Did this inspection identify any clommeter or non-stormwater unitially not previously ভ্রমাটোড়েই in your ইপটেটেট 🖸 YEŞ 👩 NO
If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any assentated control measures in place:

If you revew stormwater montaining data as part of this inspection to the interest polician) has specified to be properly to the stocker of the interest in place. If year, purposes the findings of that review and describe the stocker of the interest of this inspection to the interest of the annual interest of the annual interest of the information of their consequently, these requirements in place and the interest of the inter
If YES, summarize the findings of that rexists and describs any septitional inspection solutions resulting from the review.  The quarterly facility storm water discharge visual exemps and benchmark monitoring data for precipitation/sample events occurring to December 21, 2013, March 29, 2014, Jupp 26, 2014, and depriving 19, 2014 were reviewed at the time of the annual specifion. Note that the benchmark monitoring data concerning the September 13, 2014 sample event was not available at the pe of the annual inspection and consequently, these requirements at later date. No aptential issues and/or concerns are identified in regards to information documents of a quarterly visual inspection forms. However, the applicable MSGB andiants for GOD, Al. Gu. Fe. and/or 2n were executed in samples color forms. However, the applicable MSGB arch 29, 2014, June 26, 2014, and/or 3n were executed in samples of DA-001 and/or DA-003 on December 21, 2013, arch 29, 2014, June 26, 2014, and/or 3dptember 13, 2014. Note that the manifering requirements for TSB and Ph were fulfilled uring the 2013 - 2014 monitoring particular exempts.
ne quarterly facility storm water discharge visual exemps and benchmark mentioning data for precipitation/sample events occurring in December 21, 2013, March 34, 2014, June 26, 2014, and September 13, 2014 were reviewed at the time of the annual specifion. Note that the benchmark monitoring data concerning the September 13, 2014 sample event was not available at the ne of the annual inspection and consequently, these results were reviewed at a later date. No aptential issues and/or concerns are identified in regards to information documented via quarterly visual inspection forms. However, the applicable MSGR andards for GOD, At, Gu, Fe, and/or Zn were exceeded in samples collected at DA-001 and/or DA-002 on December 21, 2013, arch 29, 2014, June 28, 2014, and/or September 13, 3014. Note that the monitoring requirements for TSB and Ph were fulfilled uring the 2013 - 2014 monitoring particle.
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gas throughout the Kane facility property during this inspection. No wind blown litter and/or other indicators of pollutants which
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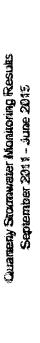
		NOTE: Copy this page and attach additional pages as necessary
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1, Brief Description:		
2. Are any control measures in need of maintenances or repair?	[] YES	Q NO
3. Have any control massures failed and require replacement?	[] YE8	[] NO
4. Are any additional/revised BMPs necessary in this area?	C) ves	[] NO
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Corrective Action Form)		, , , , , , , , , , , , , , , , , , , ,
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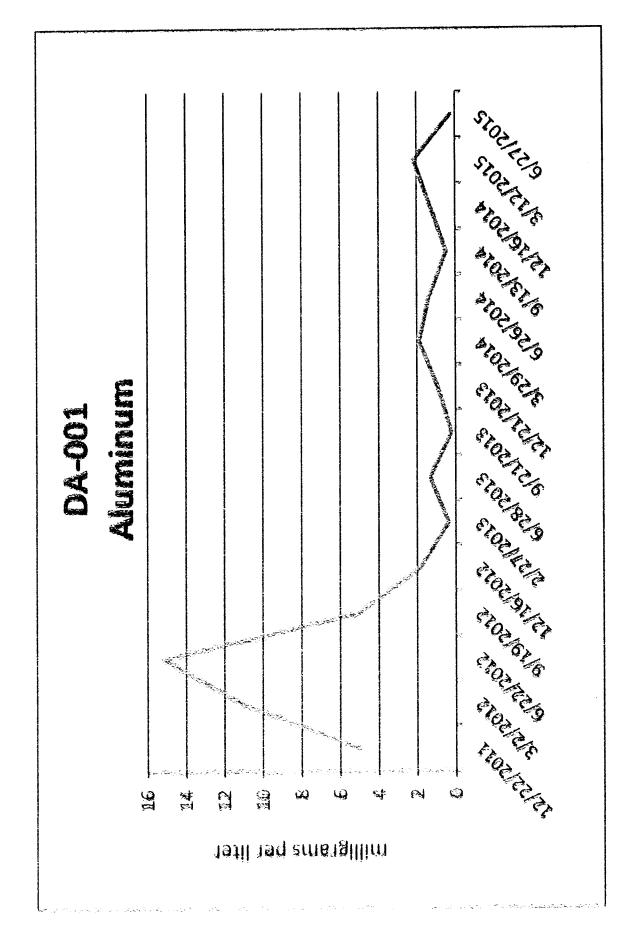
D. CORRECTIVE ACTIONS
Complete this page for each specific condition requiring a sorrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.
include both corrective actions that have been initiated or completed since the lest annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.
1. Corrective Action # 01 of 01 for this reporting period.
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The four (4) quarter everage for AI, Oy, Fe, and Eu have exceeded the equipeble MSGP banchmark manifering standards regarding samples collected at DA-00 land DA-003. Note that these parameters have indicated a decreasing trend over time and with increased control measures.  5 One precision identified:  6 Use precision was identified:
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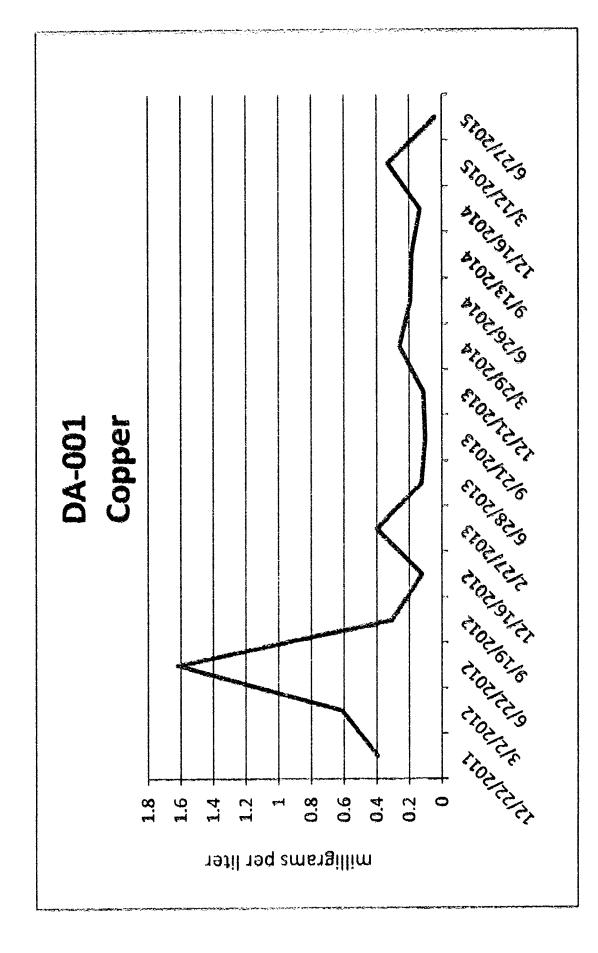
E. ANNUAL REPORT CERTIFICATION
1. Compliance Cartification
Do you cently that your annual tospection has met the requirements of Bart 4.3 of the parmit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the parmit? 以文章(〕HO
It MO' કાપ્પાપાણપુર ભર્ગત તેવેલ પછે ત્યા કરિયાકીનુકોપ્ટન ત્યાંમ તુવ્ર મેં મેંતાનોનું
2. Annual Report Cartification
I certify under panalty of law that this document and all attachments were propared under my direction or supervision in accordance with a system designed to assure that qualified personnel property gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the explan, or these persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant panalties for submitting taise information, including the possibility of line and imprisonment for knowing violations.
Authorized Representative Roberts E. Kane IIII   Title Are France And Rules III
Signature— Date Bignedi 1/2 1/1/

# ATTACHMENT E

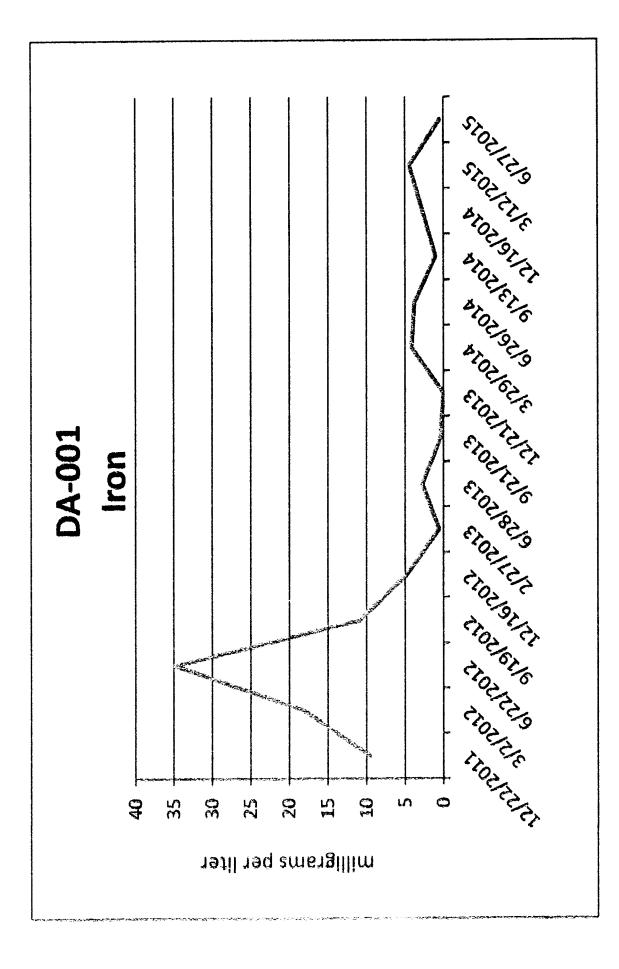
Aluminum, Copper, Iron, Zinc and Chemical Oxygen Demand Line Graphs for DA-001 and DA-002



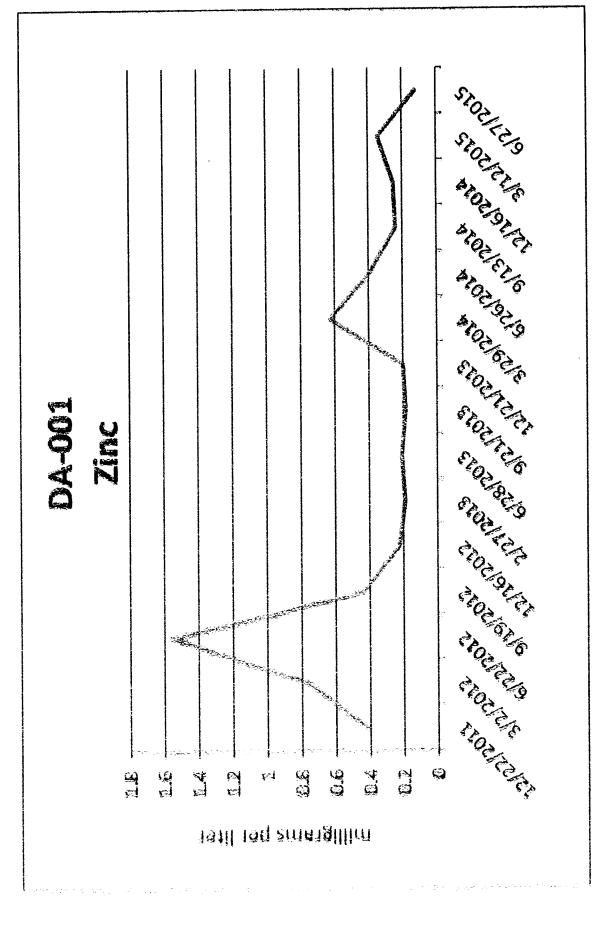


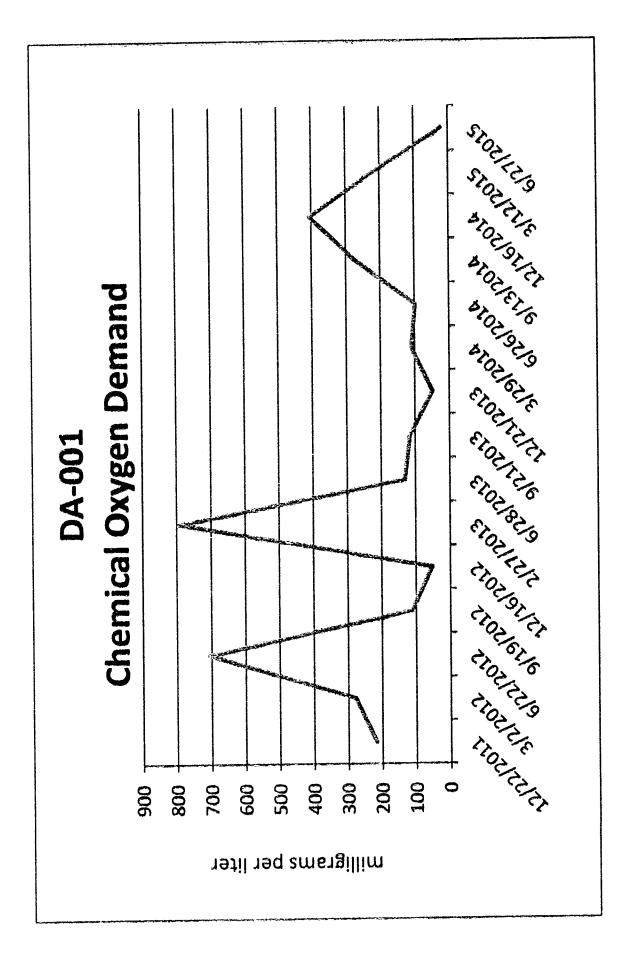


Quarterly Stormwater Monitoring Results September 2011 - June 2015

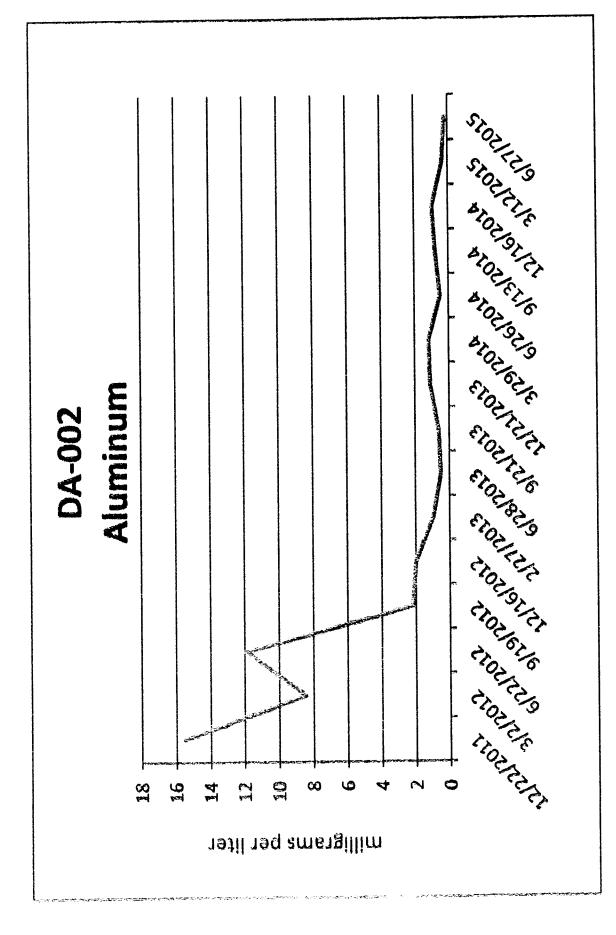


Quarterly Stormwater Monitoring Results September 2011 - June 2015





Quarterly Stormwater Monitoring Results September 2011 - June 2015



Quarterly Stormwater Monitoring Results September 2011 - June 2015

